UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Linda Gifford, William McConnell, and Ryan Crescenzo on behalf of themselves and all others similarly situated,

Plaintiffs,

-V-

Target Corporation,

Defendant.

Court File No. 10-cv-01194 (ADM/RLE)

NOTICE OF MOTION TO SEEK PROTECTIVE ORDER

PLEASE TAKE NOTICE that on July 1, 2010 at 10:00 AM. in Courtroom 3 of the United States District Court, 515 West First Street, 417 Federal Building, Duluth, Minnesota, before the Honorable Chief Magistrate Judge Raymond Erickson, Plaintiffs, by and through counsel, will move the Court for a Protective Order.

Dated: May 28, 2010 HALUNEN & ASSOCIATES.

By: /s Clayton D. Halunen. Clayton D. Halunen, #219721 Joni M. Thome, #232087 Shawn J. Wanta, # 389164 1650 IDS Center 80 South Eighth Street Minneapolis, MN 55402 Telephone: (612) 605-4098 Facsimile: (612) 605-4099

-and-

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ATTORNEYS FOR PLAINTIFFS